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**From:** Lovely, Harry [Harry.Lovely@state.co.us]  
**Sent:** Monday, November 05, 2007 3:50 PM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group  
**Subject:** RIN 1219-AB53  
**Attachments:** Miner Act Mine Rescue Team Comments.doc

Received by OSRV 11/09/2007

Dear Ms. Silvery,

The State of Colorado, Division of Mining, Safety, and Reclamation; Mine Safety and Training Program (MSTP) appreciate the opportunity to provide comments regarding the MINER Act's, Mine Rescue Teams Proposed Rules.

I have attached our comments in this email. A hard copy will also be sent through the mail today.

Thank you,

Harry A. Lovely  
Mine Rescue Coordinator  
Mine Safety & Training Program  
Colorado Division of Reclamation, Mining, & Safety  
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199. A team is a unit made up of individuals working towards a common goal...

1219-AB53-COMM-3

11/7/2007

November 5, 2007



Patricia W. Silvery  
Director of Office of Standards, Regulations, and Variances  
Office of Standards, Regulations, and Variances  
Mine Safety and Health Administration  
1100 Wilson Boulevard, Room 2350  
Arlington, VA 22209-3939

Re: RIN 1219-AB53 Mine Rescue Teams

Dear Ms. Silvery,

The State of Colorado, Division of Mining, Safety, and Reclamation; Mine Safety and Training Program (MSTP) appreciate the opportunity to provide comments regarding the MINER Act's, Mine Rescue Teams Proposed Rules.

The Colorado MSTP in conjunction with the Colorado School of Mines operate an underground mine rescue training facility in Idaho Springs, Colorado. For the past 35 years, hundreds of mine rescue teams from around the country have received realistic underground mine rescue training at the Edgar Mine Rescue Training Facility. Western MSHA mine rescue teams have also received training at our facility. An outline of the type of mine rescue training provided is listed below;

- Emergency Response Decision Making Skills are developed and enhanced using the foundation that the MSHA mine rescue contest rules provide.
- Team safety and team building are highly emphasized.
- Incident Command training has been incorporated into the training scenarios allowing companies to test their Emergency Response Plans during realistic scenarios.
- The mine rescue teams themselves experience the importance of the command center and its role.
- Scenarios are set up in a real underground mine, where real ventilation changes are required by mine rescue teams building and changing actual ventilation controls.
- The uniqueness of our training and of our facility is that very little simulation is used.
- Teams experience heavy smoke (theatrical smoke) and are trained in the many different techniques to allow them to safely and thoroughly explore when visibility is limited.
- The mine rescue teams are exposed to many different tools that other teams have shared and are using in actual underground responses. They also become more experienced with their own equipment such as gas meters, communication systems, and first aid equipment.

The Colorado MSTP believe that mine rescue contest training and the actual contests are an excellent form of mine rescue training. We also however believe that equivalent skills development is received during the realistic type of training given at the Edgar Mine Rescue Training Facility and is highly beneficial to our nations mine rescue teams. The Colorado MSTP feel that the mine rescue training given at the Edgar Mine Rescue Training Facility should be counted as an alternate to participation in local mine rescue contests.

The Colorado MSTP requests clarification and guidelines for Section 49.60 (c) Alternative to Participation in Local Mine Rescue Contests.

- Will the mine rescue training at the Edgar Mine Rescue Training Center count as a "contest" under 49.60 (c)
- The MSTP feel that single team realistic training can be very beneficial, and allows for individual team training focus. Will the three team requirement, for the number of teams participating at a local contest also apply to the number of teams or companies required per "alternative to participation in local mine rescue contests" type training sessions?
- Must smoke be incorporated into the training sessions?
- Can two separate days of training which involve different scenarios count as participating in two contests?
- Do the scenarios have to follow MSHA contest rules or can they use them as a foundation for the training?
- Will these alternatives's to mine rescue contests have to be approved by the District Manager's to ensure the effectiveness of the training program?

Thank you for your time and for allowing us to present these comments. If we can be of any future assistance in this area please feel free to contact Harry Lovely at (303) 807-7443 or Bill York-Feirn at (303) 866-3650.



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